



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

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Order Instituting Rulemaking on the)
Commission's Own Motion into the Service)
Quality Standards for All Telecommunications)
Carriers and Revisions to General Order 133-B)
_____)

R. 02-12-004

**REPLY COMMENTS OF THE UTILITY REFORM NETWORK ON SCOPING
MEMO ISSUES**

June 15, 2007

**THE UTILITY REFORM
NETWORK**

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The Utility Reform Network ("TURN") submits its reply comments on the issues identified in the Assigned Commissioner's Ruling and Scoping Memo ("ACR") issued March 30, 2007.

I. INTRODUCTION

With the exception of the small local exchange carriers, all the carriers and carrier groups filing comments oppose the imposition by the Commission of any service quality standards for telecommunications services in California. The carriers rely on what Stephen Colbert has famously termed "truthiness" – "what you want the facts to be, as opposed to what the facts are. What feels like the right answer as opposed to what reality will support."

Thus, the carriers contend: that competition will ensure high service quality; that the Commission lacks jurisdiction to impose minimum service quality standards on all telecommunications providers; that service quality standards are inconsistent with

competitive and technology neutrality; and that service quality standards will harm consumers. As discussed below, these assertions are unsupported by the facts, violate the law, and should be rejected by the Commission.

II. THE COMMISSION HAS A STATUTORY RESPONSIBILITY THAT CANNOT BE DISMISSED BECAUSE CARRIERS WANT TO ELIMINATE SERVICE QUALITY STANDARDS

As TURN discussed in our opening comments, the Public Utilities Code (“P.U. Code”) unambiguously requires the Commission to ensure that California consumers have access to high quality services and information enabling them to make informed choices, and also requires that telecommunications’ companies meet “reasonable” service quality standards.¹ While the carriers pay lip service to these requirements, they appear to believe that the Commission can fulfill them by eliminating all service quality standards. Verizon goes so far as to contend that somehow the mission statement of the Commission as articulated in the Governor’s 2007 budget trumps these statutory requirements. Thus, Verizon’s Dr. Aron states that, “[b]y focusing on safety and reliability, the Governor’s articulation of the Commission’s fundamental objective is...consistent with the ... position of Verizon that current carrier reporting requirements pertaining to quality of service should be discontinued....”² AT&T contends that “reliance on competition combined with customer satisfaction information...” satisfies the Commission’s statutory

¹ California Public Utilities Code (“P.U. Code”) §§ 709(a) and (h), 2896(a) and (c) and 2897.

² Declaration of Dr. Debra J. Aron Supporting Opening Comments of Verizon, p. 4 (“Aron”).

obligations.³ Contrary to these assertions, TURN submits that the Commission has an affirmative statutory responsibility to set minimum service quality standards for all telecommunications providers in California and to ensure that consumers have access to information necessary to make informed choices among these providers. And, neither the Commission's nor Governors interpretation of the Commission's mission excuses the Commission from meeting its statutory responsibilities. Contrary to the assertion by Verizon that the issues in this proceeding "do not significantly involve issues of safety"⁴ there is a direct link between service quality standards for telecommunications services and issues of safety and reliability. For example, a consumers' inability to make an emergency call due to an out-of-service condition can have significant safety implications. Similarly, a disabled consumer who must rely extensively on telecommunications services is placed at significant risk if his/her phone does not work or the quality of the reception is such that a call cannot be effectively completed. Given the importance of telecommunications services to the lives of all Californians TURN submits that the Commission has a higher standard to meet when contemplating eliminating minimum service quality metrics.

III. CONTRARY TO THE ASSERTIONS OF THE CARRIERS COMPETITON CANNOT BE RELIED UPON TO ENSURE MINIMUM SERVICE QUALITY

³ Opening Comments of ...AT&T...in Response to ...Assigned Commissioner's Ruling and Scoping Memo, p. 5 ("AT&T").

⁴ Aron, p. 11.

The carriers' principal contention is that the competitive market will ensure that telecommunications services are of high quality. Verizon, for example, urges the Commission to take a "market-based" approach and rely on competition "as the best 'regulator' of service quality in today's intermodal communications market."⁵ Similarly, AT&T posits that "there simply is no reason why competition cannot regulate service quality when it can protect consumers, ensure competitive prices, and justify the elimination of certain asymmetric requirements previously applicable only to the incumbent carriers...."⁶

The carriers provide little but anecdotes to support their contention that competition will ensure minimal service quality standards. Verizon further muddies the waters by asserting that "the regulatory process is fundamentally unsuited for determining optimal levels of service quality."⁷ In fact, TURN is not seeking a regulatory mandate of "optimal" service quality. Rather, our simple, straightforward proposal is merely seeking that the Commission meet its responsibilities to consumers and mandate **minimal** service quality standards.

AT&T relies extensively on its witness Dr. Harris to support elimination of all service quality requirements. Yet, AT&T's own witness argues that

Information gathered and disseminated to consumers, along with mandated minimum performance levels where required for consumer protection, enhance

⁵ Opening Comments of Verizon California...on ... Assigned Commissioner Ruling and Scoping Memo, p. 3 ("Verizon"). See also AT&T, p. 5; Comments of Citizens...D/B/A Frontier..., p.2 ("Frontier"); Opening Comments of SureWest...on Assigned Commissioner's Ruling and Scoping Memo, p. 2 ("SureWest"); Comments of CTIA...on Scoping Memo Issues, p. 7 ("CTIA"); and Comments of Joint Commenting Parties in Response to Assigned Commissioner's Ruling and Scoping Memo, p. 3 ("Joint Comments").

⁶ AT&T, p. 5.

⁷ Aron, p. 11.

competition by assuring customers of the safety of the products offered and providing comparable measurements of important product characteristics.⁸

This is precisely the nature of the standards TURN has proposed “mandated minimum performance levels” to ensure that consumers have access to a reasonable level of quality for telecommunications services that are crucial for functioning in modern society and have critical public safety implications. It is hard to fathom how such minimal requirements will produce the parade of horrors alleged by the carriers – harm to competition; elimination of lower quality choices; and damage to consumers.

Verizon asserts that a regulator could not possibly develop an appropriate set of service quality metrics and that “a consequence of wrongly specified standards is that they will force service providers to divert resources from providing service attributes that customers care about to providing the attributes regulators care about.”⁹ What this position completely obfuscates is that with all the service quality monitoring performed by telecommunications providers, combined with the Commission’s experience and a bit of common sense, it is not hard to figure out what the most critical service quality metrics need to be for both wireline and wireless services. TURN submits that its proposal represents such a set of metrics:

- Customers care about when their service will be available and over what coverage area;

⁸ AT&T, p. 5 quoting Comments of Dr. Robert G. Harris in R.02-12-004, Prepared for SBC California, filed April 1, 2003 (“Harris Opening”), p. 26.

⁹ Aron, p. 16.

- Customers want their calls completed in a manner that allows them to have a clear conversation and not have their calls dropped or otherwise uncompleted;
- In the event of service interruption, customers want to get their service restored in a reasonable period of time;
- When calling their carrier, customers care about how long it takes to speak to a live human being; and
- Customers want to know that if they have a complaint it will be handled in a fair and expeditious manner.

Developing these service quality indicators is not “rocket science.” In fact TURN’s indicators are based on and consistent with service quality metrics found significant by the National Association of Regulatory Utility Commissioners (“NARUC”) in its 1998 Service Quality White paper as well as by third party organizations that regularly assess service quality. For example, J.D. Power (who the carriers frequently cite with approval) produces customer satisfaction surveys that measure at a minimum the very same elements that TURN has identified in its proposal.

The fact that TURN’s proposed service quality indicators are complimentary with what third party survey companies measure, however, should not lead to the conclusion that Commission mandated measures are unnecessary. Customer satisfaction surveys while potentially informative are no substitute for objective indicators. Firms such as J.D. Power base their work on a sampling of customers’ subjective impressions (and usually not even on a customer’s recent transactional experience with the subject of the survey). In comparison, TURN’s service quality indicators are objective, based on actual events –

e.g., the number of complaints actually filed, or the number of calls actually completed, or the exact time it takes to repair an out-of-service condition. While consumer satisfaction surveys offer customers some useful data, knowledge about specific performance of one carrier versus another truly empowers consumers to enable them to make intelligent choices in an ever more complex marketplace.

Verizon's Dr. Aron discusses the significance of low probability, high impact events and suggests that in such situations competition may not be sufficient to protect the public interest.¹⁰ In further discussing this issue, Dr. Aron states that "research has found that where consumer decisions involve assessing the likelihood of events that have very small probabilities of occurring, individuals tend to have a poor ability to make accurate assessments and rational decisions."¹¹ This is precisely why TURN's proposed service quality indicators should be adopted. They provide minimum service levels for adverse situations which customers don't expect. For example, consumers do not expect to need a repair or to have an outage, yet when such occurs it represents a high impact event for them. Similarly, it is likely that it is a low probability for a customer to have to communicate with a carrier's call center, particularly when carrier's web sites are accessible. However, if all else fails the customer must contact the call center and the need to do so likely has high impact for that consumer. The average customer does not expect billing errors – most take billing accuracy for granted. However, due to the significance for consumers of the effect of billing errors, monitoring of complaints and

¹⁰ Aron, pp. 10-11.

¹¹ Aron, p. 10.

billing complaints in particular cannot be left to the market.¹² Given a customer's difficulty in accurately assessing the likelihood of a low probability, high impact event combined with the lack of competition on the basis of these service elements, the Commission should demand a minimal level of service quality to afford consumers both protection and information in these areas. In addition, such safeguards promote consumer trust in the market offering confidence that all carriers are motivated to provide at least the same minimum level of service.

This approach also avoids what TURN considers one of the most negative outcomes of having no minimum service quality standards – lower quality for lower price. In touting the benefits of relying on the marketplace, the carriers argue that competition will provide the proper incentives for carriers to ensure reasonable quality. For example, Verizon argues,

The ability to offer combinations of quality and price without regulatory constraints permits companies to seek to offer portfolios of service characteristics that best meet consumer demands, at prices that are disciplined by competition. If any firm were to charge excessively for higher quality, competitors could match the higher quality while undercutting the other firm's price. If a firm were to offer insufficient quality for the price charged, a competitor could offer the same quality at a lower price or a higher quality for the same price.¹³

The third option ignored by the carriers is lower quality at a lower price. For consumers for whom price is perhaps the most significant element in choosing telecommunications services, lower quality for lower price may be a very attractive

¹² Of the informal complaints reported to the PUC regarding (then) PacBell, the most frequent categories concerned disputed bills and quality of service. The service quality complaint case regarding DSL billing (C.02-01-007/I.02-01-024) was preceded by an increase in complaints regarding DSL issues. See Testimony of Gayatri M. Schilberg on Service Quality in the New Regulatory Framework, on behalf of TURN, R.01-09-001/I.01-09-002, June 28, 2002, p. 40.

¹³ Aron, p. 9.

option. However, for this demographic of low income consumers (and frequently the disabled fall into this category), minimum service quality standards provide a floor ensuring that all consumers have at least a basic level of quality and fair treatment. Further, as TURN discussed in our 2003 comments in this proceeding, poor service quality has negative externalities for the rest of society.

Individual subscribers and the economy in general are negatively impacted when other customers cannot be reached, for example, because of installation or repair problems or poor call quality. Allowing poor-quality carriers to flourish reduces the quality of service for all. This in turn creates negative externalities that adversely affect the economy, worker productivity, information flow, and emergency response capability. If phone service is not functioning or is not promptly repaired, the inability to reach authorities in an emergency can result in loss of life, increased suffering due to the inability to receive prompt medical attention, or damage to property. Reliable telecommunications service is essential for the economy to function efficiently and for public agencies to perform their work effectively. The telephone line is fundamentally important to individuals seeking employment, as well as for communication with schools, government agencies, businesses and between employers and their employees. Reliable telecommunications service has become much more important to businesses of all sizes as they increasingly utilize more telecommunications lines, fax machines and the Internet.

As in any situation with externalities, a customer's individual choice, for example of a carrier that cannot meet minimum quality of service criteria, affects more than his own service--it affects the service quality of all customers who deal with him. A well-running telecommunications network has characteristics of a public good, where the whole is greater than the sum of its parts. More subscribers on the network creates a positive externality, in that more people can be contacted, and more business possibilities exist. A well-running network supports business and the economy, especially in this information age.¹⁴

Despite the carriers' unsubstantiated warnings, the Commission should not fear an automatic price increase by setting minimum standards. There is a statutory obligation to set just and reasonable rates for telecommunications, so the carriers cannot use minimum quality standards as an excuse to gouge low income and disabled consumers.

¹⁴ Opening Comments of TURN, pp. 8-9 (April 1, 2003).

IV. SERVICE QUALITY INDICATORS ARE CONSISTENT WITH A COMPETITIVE MARKETPLACE

In support of its approach to eliminate all service quality standards, Verizon offers examples from several industries to demonstrate “the power of competition and consumer choice in driving service quality...”¹⁵ Dr. Aron discusses the automobile industry, the airline industry, wireless services and broadband internet access services and the increases in service quality in those sectors resulting from competition. While Dr. Aron is correct that certain industries have seen significant improvements in quality as a result of competition (automobiles), or lower quality for lower price (airlines), she conveniently ignores the fact that even in highly competitive industries minimum service quality standards are enforced.

For example, in the automobile industry sellers of cars must disclose the correct odometer reading and whether an automobile has been in a serious crash. In California, consumers are protected by the “lemon law” (the Song-Beverly Consumer Warranty Act, beginning with Civil Code section 1790) which specifically speaks to the quality of motor vehicles. There are also strict regulations on the auto makers from the National Highway and Traffic Safety Administration as well as the Environmental Protection Administration that focus on minimum standards for safety, fuel economy, and alternative fuels. Regulators routinely hold airlines to strict noise requirements, insuring that passenger eardrums are not assaulted as well as protecting those on the ground. The Food and Drug Administration (“FDA”) imposes voluminous quality regulations.

¹⁵ Aron, p. 18. See also AT&T, p. 6 referencing Dr. Harris’s 2003 pleadings.

Insurance companies must comply with significant disclosure requirements and anyone selling real estate in California must disclose the quality of the structure being sold.

California's Contractors State License Board tracks customer complaints about contractors and provides a web site that allows any customer to research a contractor's complaint history.¹⁶

What Dr. Aron also ignores is the fact that telecommunications services, unlike automobiles and airlines, are essential services representing a major part of the glue that holds our society together. There are alternatives to automobile and airline travel – not so for access to crucial telecommunications services. While there may be competitors providing communications capabilities, the actual service itself is a necessity. Access to quality telecommunications services is very different than whether the airline one takes provides free meal service or even whether it will arrive on time to its destination.

Some carriers also appear to suggest that service quality indicators are unnecessary because telecommunications service providers are already providing good quality. For example, Verizon cites a recent J.D. Power customer satisfaction survey for the proposition that thanks to competition wireless quality continues to rise. While the cited survey does in fact indicate that a group of customers are more satisfied with wireless providers, there are other equally compelling studies that, while seeing increases in quality, conclude that “wireless service remains one of the five lowest scoring industries” in the American Customer Satisfaction Index (“ACSI”)¹⁷. Furthermore, an

¹⁶ See also Opening Comments of the Utility Consumers' Action Network, pp. 6-10 (April 1, 2003) for additional examples.

¹⁷ See May 15, 2007 ASCI press release at <http://www.theacsi.org/images/stories/images/news/0507q1.pdf>

April 2007 MSN Money survey found that five of the 10 companies cited as worst for customer service were in the communications field.¹⁸ These different findings aptly illustrate the weakness of relying on customer satisfaction surveys to accurately identify whether carriers are providing minimal service quality. As noted above, while such surveys may provide some data for consumers there is so much variability in assessing quality through subjective means that consumers are often left confused about exactly the quality of service that any particular carrier provides.

V. THE CARRIERS' JURISDICTIONAL ARGUMENTS ARE WITHOUT MERIT

Several parties allege that the Commission lacks jurisdiction to impose minimum service quality standards over all providers of telecommunications services in California. However, none of these parties provide any support for this contention¹⁹, or in Verizon's case provides misinformation. Verizon asserts that the

Commission lacks regulatory authority over all intermodal providers. This point is beyond dispute. In its 2004 Vonage decision, the FCC explicitly preempted state regulation of nomadic or "over-the-top" VoIP services and suggested that comparable state regulation of fixed VoIP would likely suffer a similar fate. The 8th Circuit recently affirmed the FCC's preemption decision. This Commission acknowledged its own jurisdictional limitations in June 2006, citing "uncertainty" over its regulatory role, and these limitations continue to influence Commission policy. The lack of state regulatory authority over VoIP makes developing standard measures for all intermodal providers legally questionable.²⁰

¹⁸See MSN Money at

<http://articles.moneycentral.msn.com/SavingandDebt/Advice/HowCompaniesWereRanked.aspx>

¹⁹ See, for example AT&T, p. 7 and SureWest, p. 5.

²⁰ Verizon, p. 8 citing *Minnesota PUC v. FCC*, 2007 U.S. App. LEXIS 6448 for support (footnotes omitted).

The reality is that the courts have not held that all state authority over every type of VoIP has been preempted by the FCC. What the 8th Circuit Court in *Minnesota PUC v. FCC* actually held was that what the FCC has done to date is legal. The FCC focused its discussion in its Minnesota Vonage decision on entry certification and tariff filing requirements and other “related” requirements that would impede a VoIP carriers’ ability to enter and respond to the marketplace. The FCC was intent on protecting Vonage-type VoIP carriers from states attempting to impose strict entry requirements, burdensome technical or financial requirements or rate regulation to varying degrees. It was concerned that certain economic regulation by states would harm consumers and conflict with the FCC and Congress’ policy of “non-regulation.”

TURN submits that what this means is that the Commission cannot require Vonage-type “nomadic” VoIP providers to obtain state certification before operating in California and that the Commission cannot impose rate regulation on those providers. The case cannot be read to preempt state imposition of service quality standards because that issue was neither before the FCC nor the Court of Appeals. Furthermore, narrowly tailored service quality indicators such as those proposed by TURN hardly raise the policy concerns set out by the FCC in its Order. Finally, to put the FCC Order in perspective, the Court was extremely clear that the issue of regulatory jurisdiction over “fixed” VoIP services such as that provided by cable companies was not ripe for review because the FCC had yet to even rule on that issue.²¹

²¹ *Minnesota PUC v. FCC*, 2007 U.S. App. LEXIS 6448, *28-29 (In so ruling the Court stated that the FCC’s suggestion that it might preempt “fixed” VoIP services had no significance contrary to the meaning Verizon would like to attach to the FCC’s possible future actions.)

This conclusion is consistent with another recent court decision, *Comcast v. Missouri Public Service Commission*²² issued on January 18, 2007. In that case, decided by the U.S. District Court for the Western District of Missouri, Comcast was seeking an injunction precluding the Missouri Public Service Commission (“Mo. PSC”) from regulating Comcast’s VoIP service and in particular from requiring Comcast to file for a certificate of service authority as a provider of local exchange and interexchange telecommunications in Missouri. Comcast argued that since the FCC had not classified VoIP as either a telecommunications service or an information service, then the Mo. PSC was absolutely preempted from declaring Comcast’s VoIP offering as a telecommunications service and thus subject to state authority. In ruling against Comcast, the Court held that all the FCC has done to date is declare that only *Vonage-type* VoIP services can not be separated into interstate and intrastate communications and thus those specific services were preempted. Thus, the District Court found, as did the 8th Circuit in the *Minnesota* case that the FCC’s Order finding it impossible to separate interstate and intrastate communications did not apply to all VoIP services. Further, the District Court found that the FCC “has not preempted the entire field of VoIP services”²³ since the FCC has not yet decided on the status of “fixed” VoIP services such as those provided by Comcast.

These decisions are a far cry from the carriers’ contentions that the Commission lacks jurisdiction to require minimum service quality standards. At most, the Commission

²² *Comcast IP Phone of Mo., LLC v. Missouri PSC*, Case No. 06-4233-CV-C-NKL, U.S. District Court for the Western District of Missouri, Central Division, 2007 U.S. Dist. LEXIS 3628, January 18, 2007 (*Comcast Case*).

²³ *Comcast Case*, slip opinion, p. 10.

may be preempted from requiring “nomadic VoIP” carriers to meet service quality standards. However, that segment of the telecommunications market is relatively small, and the VoIP market is dominated by cable and ILEC service providers.

While carriers did not specifically raise jurisdictional issues with regards to wireless services in the most recent opening comments, the wireless providers are on record in this proceeding arguing that the Commission has no authority to impose service quality standards on wireless. TURN discussed this issue in its 2003 pleadings (adopting the arguments made by the National Consumer Law Center (“NCLC”) and the Utility Consumers’ Action Network (“UCAN”).²⁴ We will not repeat those arguments herein but it is worth noting that since 2003 several states impose or plan to impose service quality requirements on wireless carriers who are also “eligible telecommunications carriers” (“ETCs”). According to a recent study by the National Regulatory Research Institute (“NRRI”),

The Illinois Commerce Commission (ICC) has an open docket addressing additional requirements on wireless ETCs. ICC plans to impose more restriction on wireless ETCs even though it may face objections from wireless service providers. The Iowa Utilities Board requires wireless ETCs to comply with its complaint procedures and a specified set of minimum consumer protection standards. Meanwhile, Kansas Corporation Commission requires their wireless ETCs to offer reasonably priced calling plans without a termination fee. Finally, the Vermont Public Service Board established customer protection and ETC obligation requirements on RCC Atlantic, Inc., the wireless carrier designated in 2005 as an ETC to serve the entire state. Some of the additional requirements on RCC include the provision of “Preferred Usage Location” and service extending measures; discounts to speech or hearing impaired customers; protection from disconnection of local service for nonpayment of toll charges, as well as,

²⁴ Reply Comments of TURN, p. 42 (May 5, 2003); Opening Comments of the Utility Consumers’ Action Network, pp. 12-20 (April 1, 2003); Initial Comments of the National Consumer Law Center, pp. 19-25 (April 1, 2003).

emergency services, blocked calls, and ratepayer deposit requirements. RCC was also required to submit monthly call blocking reports.²⁵

While these service quality related requirements are specifically targeted at wireless ETCs, they do illustrate the point that states can impose consumer protection requirements on wireless carriers. In fact, a recent decision by the U.S. Court of Appeals for the 10th Circuit specifically found that there is nothing in the 1996 Telecommunications Act preempting states from regulating “other terms and conditions” aside from market entry and rates for wireless carriers. Thus, in affirming a states right to impose different requirements than the FCC requires for ETCs, including wireless ETCs, that court stated,

Congress envisioned that state commissions could regulate mobile services for “such matters as customer billing information and practices and billing disputes and other consumer protection matters; facilities siting issues (e.g., zoning); transfers of control; the bundling of services and equipment; and the requirement that carriers make capacity available on a wholesale basis or such other matters as fall within a state's lawful authority. This list is intended to be illustrative only and not meant to preclude other matters generally understood to fall under ‘terms and conditions.’”²⁶

It is therefore clear that the Commission has the requisite authority to impose reasonable service quality standards on wireless carriers.

²⁵ “State Certification Requirements for Eligible Telecommunications Carriers,” The National Regulatory Research Institute, February 2007, p. 6 (available at: <http://www.nrri.ohio-state.edu/Telecom/state-certification-requirements-for-eligible-telecommunications-carriers>).

²⁶ *WWC Holding Co., Inc. v. Sopkin, Page, Miller Colorado PUC*, Case No. 06-1156, U.S. Court of Appeals 10th Cir. (June 5, 2007), slip opinion, pp. 13-14 (footnote omitted).

VI. DRA’S PROPOSALS ARE GENERALLY CONSISTENT WITH TURN

In Opening Comments the Division of Ratepayer Advocates (“DRA”) takes positions generally consistent with those advocated by TURN. Thus, for example, DRA supports the establishment of minimum service quality standards, recognizes that customer satisfaction surveys are not a substitute for minimum standards, and makes specific proposals for wireline service quality measures and standards.²⁷ TURN supports minimum standards also, as identified in our Opening Comments (p. 11), and the three indicators with goals that TURN proposed are similar to some of DRA’s.

The 5-day goal that DRA proposes for ARMIS installation intervals, however, is not stringent enough. TURN recommends 3 business days. DRA’s method for setting the goal examines the performance of 1) small LECs, 2) mid-sized LECs, and 3) the reference group of companies used by the Commission in D.03-10-088.²⁸ As the standard, DRA selected the lowest (e.g. least stringent) performance average among the three groups. While this increases the probability that parties will find the proposed standards to be acceptable, TURN questions whether the method adequately protects customers. If a standard is loose, it can tempt companies that are performing better to backslide, because there is no adverse regulatory consequence. Inspection of the data clarified that the 5-day goal is driven by the average of the small LEC group alone. The

²⁷ Opening Comments of the Division of Ratepayer Advocates on the Assigned Commissioner’s Ruling and Scoping Memo...pp. 5 and 19-20 (“DRA”).

²⁸ It should be noted that no evidence on the performance of these companies was presented on the record during the NRF proceeding, R.01-09-001 and I.01-09-002. The method for looking at a reference group of utilities to judge reasonable performance was created by Commission staff after the hearing. Thus the reasonableness of using such a method has not been subject to testimony and hearings.

average installation time for both the reference group and the mid-sized LECs, which serve many more customers than the small LECs, is under 2 days for each group.²⁹

Furthermore a 5-day standard itself is lax. In its “Model Telecommunications Service Rules,” NARUC identified the service objective for exchange carriers of “Ninety percent of the exchange carrier’s primary service order installations shall be completed within three working days.” (July 22, 1987, p. 35). Having as a minimum goal an average installation time of 5 days is too low to provide high quality service to California customers.

DRA also filed separate opening comments discussing wireless service quality issues. In its pleading, DRA recommended service quality surveys, reporting, and color coded street level coverage maps for wireless service. In particular, DRA proposed “that the Commission require wireless service providers to post on their Internet sites and make available in their stores coverage maps of the same *granularity* and accuracy as used by their engineers.”³⁰ TURN supports the DRA wireless proposals and urges the Commission to adopt them.

VII. CONCLUSION

For the reasons stated above, TURN requests the Commission to adopt TURN’s proposed service quality measures and associated service guarantees for all carriers under the Commission’s jurisdiction.

²⁹ Work papers to Opening Comments of DRA on the ACR and Scoping Memo, May 14, 2007.

³⁰ Comments of the Division of Ratepayer Advocates re Inclusion of Wireless Coverage Maps as Part of the Commission’s Rulemaking 02-12-004, p. 3.

Respectfully submitted

June 15, 2007

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CERTIFICATE OF SERVICE

I, Lela Yeomans, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On June 15, 2007 I served the attached:

**REPLY COMMENTS OF THE UTILITY REFORM NETWORK ON SCOPING
MEMO ISSUES**

on the eligible parties on the service list for R.02-12-004 by sending said document via email to each of the parties as reflected on the attached Service List.

Executed this June 15, 2007, at San Francisco, California.

_____/s/_____

Lela Yeomans

CALIFORNIA PUBLIC UTILITIES COMMISSION

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